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PROPOSED ATTORNEYS FOR
HIGH PLAINS RADIO NETWORK, LLC,
DEBTOR AND DEBTOR IN POSSESSION

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	
	§	
HIGH PLAINS RADIO NETWORK, LLC,	§	CASE NO. 24-70089-swe
	§	(Chapter 11, SubV)
DEBTOR.	§	
	§	

**MOTION TO REJECT ALL LEASES WITH VERTICAL BRIDGE REIT
LLC**

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE ST., RM. 1254, DALLAS, TX 75242-1496. BEFORE CLOSE OF BUSINESS ON MAY 21, 2024, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE SCOTT W. EVERETT, U.S. BANKRUPTCY JUDGE:

High Plains Radio Network, LLC, debtor and debtor in possession (the “Debtor” or “HPRN”), files this *Motion to Reject All Leases with Vertical Bridge REIT LLC* (the “Motion to Reject” or the “Motion”) and in support thereof would show to the Court the following.

1. Debtor files this Motion with great reluctance, but the premature filings of Vertical Bridge REIT LLC (“Vertical Bridge” or “VB”) on April 30, 2024, Docket No. 65-66 (together, the “VB Motions”) necessitate that the Debtor files this Motion in order to seek to reduce the administrative expense burden to the estate that is the subject of the VB Motions, especially in light of the apparent and/or potential accrual of some rent on May 1, 2024 under the applicable leases.¹

2. To be clear, it is the desire of Debtor to arrive at a position with Vertical Bridge in the next several days that would permit the abatement, withdrawal, and/or other resolution of this Motion, a rationalization of the administrative burdens on the estate relative to, *inter alia*, the market value of the leases, the potential demands of secured creditors (which subset excludes Vertical Bridge) which might seek adequate protection, and the available resources of the Debtor, and thus delay a dispositive or final determination of the leases until a sale process completes.²

3. Debtor will respond and object in further detail to the VB Motions filed on April 30, 2024 filings. For now, suffice to say, aside from any of the prior litigation between the parties, this case presents a narrow situation in which Vertical Bridge on its very best day possess series of leases that are substantially above market, the rents of which this case could

¹ Efforts with Vertical Bridge to find a resolution with respect to timing of this Motion and the potential May 1, 2024 rent accrual in the late afternoon and evening of April 30, 2024 were not fruitful.

² Even still, the administrative rent question needs to be addressed now. A full sales process seems to lack rationale if the primary or net result is to simply satisfy administrative rent.

never bear if fully assessed, and for which some value might be preserved for Vertical Bridge and the estate through a sale process that the Debtor has pursued with diligence from day one, and which sale process is insisted upon by Vertical Bridge.

4. On the other hand, on its worst day, Vertical Bridge possesses a very small handful of leases in actual use as of March 26, 2024, the (“Petition Date”) that ultimately may be rejected upon a final hearing on this Motion, and with a final hearing on this Motion determining that the vast majority of leases terminated prepetition and/or that the Debtor has not used the leases in months or years, thus nullifying any potential administrative rent claim. The idea that there are dozens of active leases used by the Debtor is incorrect.

5. Again, it bears repeating that the Debtor sought to delay this discussion and not bring into the open the status of any of the leases. On or about April 5, 2024, Debtor and Vertical Bridge agreed that Media Services Group LLC (“MSG”) led by Bill Whitley (“Whitley”)³ would act as the broker, and a motion to retain the arrangements is forthcoming.⁴

6. Over the last 14-21 days or more, Debtor has met with and/or interacted with Whitley on several occasions. The Debtor and Vertical Bridge have provided Whitley with source documents and information. The Debtor and Whitley have engaged in at least two (2) video conferences including most recently on April 29, 2024. The inference in the VB Motions that a lack of progress exists on the most promising exit from this case is disingenuous.

7. The timing and aggressiveness of the VB Motions are unfortunate, unnecessary, and misplaced. Vertical Bridge complains of administrative insolvency, but has filed about 60 pages of verbose and densely briefed pleadings which must have cost several thousands of

³ <https://mediaservicesgroup.com/staff-member/bill-whitley/>

⁴ Debtor anticipated filing the broker retention motion this evening, but instead is addressing the VB Motions.

dollars to produce and which likely exceed one or more months of the administrative rent that might be paid.

8. Vertical Bridge fired these salvos approximately 24 hours after a call where real progress was made on the sale process. Vertical Bridge exchanged various views and market observations with Whitley, and Whitley reported that MSG was ready to build a data room, among other progress. The Debtor also reported to Vertical Bridge that it would address the adequate protection question with a proposal or analysis to be delivered on April 30, 2024, once schedules had been completed and filed on April 29, 2024. Nonetheless, Vertical Bridge couldn't wait a full day after the filing of the schedules to file the VB Motions.

9. The timing of the VB Motions is even more frustrating considering that ample time remained for a full 21-days notice to place things on the docket with the May 28, 2024 items already set in this case, that the current window to put a lift stay on the next docket (Dallas or Wichita Falls) is several days away, and that the filings could have occurred at the end of the week. The leases constitute nonresidential real property leases, and the Debtor remains well within the 60-day grace period of Code § 365(d)(3). As will be developed in the objections to the VB Motions, the Debtor has not ignored the administrative rent question, but instead the Debtor realizes the cash position that must be managed over the course of this case if value is to be maximized in a sale process, especially when a long sales process and FCC closing issues loom ahead.

10. The posturing and aggressiveness of the VB Motions is directly contrary to what will be required of VB and the Debtor over the ensuing months. Vertical Bridge has agreed with and insisted on a sales process; however, a full sales process would seem to lack rationale if the

primary or net result is to simply satisfy administrative rent of one creditor disproportionate to any other claim or class in this case.

11. A list of the lease with Vertical Bridge and/or the properties of the Debtor involving a lease is attached hereto as **Exhibit H013**. The Debtor reserves the right to amend and/or supplement this exhibit to more fully explain the status of the leases.⁵

12. The Debtor has identified the leases that were not in use as of the Petition Date, some or all of which had terminated pre-petition, and/or some which had not terminated but which the Debtor has ceased the use of well prior to the Petition Date, all with ample, contemporaneous, prior knowledge by Vertical Bridge (collectively, the “Inactive Leases”).

13. Accordingly, the Debtor respectfully requests that the Court reject the Inactive Lease effective as of the Petition Date.

14. The Debtor has a small subset of leases which are still in use by the Debtor (collectively, the “Active Leases”). Accordingly, the Debtor respectfully requests that the Court reject the Active Leases also effective as of the Petition Date, or, alternatively, not later than the filing of this Motion on April 30, 2024.

15. Again, to emphasize, the Debtor desperately hopes to be able to abate, withdraw, and/or otherwise resolve this Motion in the coming days so that the parties may renew and intensify their focus on a sales process, and the Debtor stress that this Motion is filed only because of the unfortunate timing of the VB Motions and the necessity to address the administrative rent question occasioned thereby.

16. Debtor reserves the right to amend, supplement, and/or withdraw this Motion.

⁵ Debtor believes the agreements or arrangements with VB constitute nonresidential leases of real property. However, the Debtor reserves the right amend and/or revise this position. In any event, Debtor seeks in this Motion to reject all agreements whether the agreements constitute leases or executory contracts.

17. A proposed form of order accompanies this Motion and is incorporated by reference herein.

WHEREFORE, High Plains Radio Network, Debtor and Debtor in Possession, respectfully requests that the Court reject all of the lease with Vertical Bridge as set forth above effective as of the Petition Date. Debtor requests such other and further relief to which Debtor is entitled at law or in equity.

Dated: April 30, 2024

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
JEFF CARRUTH (TX SBN: 24001846)
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PROPOSED ATTORNEYS FOR
HIGH PLAINS RADIO NETWORK, LLC,
DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The parties exchanged views in a call on April 29, 2024. Debtor presumes Vertical Bridge opposes this motion.

/s/ Jeff Carruth
Jeff Carruth

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on April 30, 2024 (1) by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below and (2) by regular mail to all parties appearing in the attached service list.

/s/ Jeff Carruth
Jeff Carruth

ECF SERVICE LIST

24-70089-swe11 Notice will be electronically mailed to:

Jeffery D. Carruth on behalf of Debtor High Plains Radio Network, LLC

jcarruth@wkpz.com,

jcarruth@aol.com; atty_carruth@trustesolutions.com; carruthjr87698@notify.bestcase.com; ATTY_CARRUTH@bluestylus.com; jcarruth@ecf.courtdrive.com

Paul H. Cross on behalf of Creditor Hanmi Bank phclease@msn.com

Shanna M. Kaminski on behalf of Interested Party Union Funding Source, Inc. skaminski@kaminskilawpllc.com

Sherrel K. Knighton on behalf of Creditor Malakoff ISD Sherrel.Knighton@lgbs.com, Dora.Casiano-Perez@lgbs.com; Sean.French@lgbs.com; Eva.Parker@lgbs.com; Alexis.Hall@lgbs.com; Dallas.Bankruptcy@lgbs.com

Matthew F. Kye on behalf of Creditor Amur Equipment Finance, Inc. mkye@kyelaw.com, dsullivan@kyelaw.com

Julie Anne Parsons on behalf of Creditor Eastland County Appraisal District jparsons@mvalaw.com, kalexander@mvalaw.com; theresa.king@mvalaw.com; juanie.montalvo@mvalaw.com

Julie Anne Parsons on behalf of Creditor The County of Henderson, Texas jparsons@mvalaw.com, kalexander@mvalaw.com; theresa.king@mvalaw.com; juanie.montalvo@mvalaw.com

Julie Anne Parsons on behalf of Creditor The County of Stephens, Texas jparsons@mvalaw.com, kalexander@mvalaw.com; theresa.king@mvalaw.com; juanie.montalvo@mvalaw.com

Scott M. Seidel -SBRA V scott@scottseidel.com, csms11@trustesolutions.net; susan.seidel@earthlink.net

Dawn Whalen Theiss on behalf of Creditor Small Business Administration dawn.theiss@usdoj.gov, brooke.lewis@usdoj.gov; CaseView.ECF@usdoj.gov

United States Trustee ustpreion06.da.ecf@usdoj.gov

David Weitman on behalf of Creditor Vertical Bridge REIT, LLC david.weitman@klgates.com

SERVICE LIST

A	B	C	D	E	F	G	H	I
1	SERVICE LIST	Case No. 22-51323	In re: KuberExami, LLC			UPDATED:	4/30/2024	
2	C:\Users\jcaruth\VD Office Echo\VAULT_C55\ZTIV\service list (hpm) 001 4878-4499-4995 v.8.xlsx Sheet1							
	Name	Address1	Address2	Address3	City	State	Zip	Email
								Method of Service / Comment
3	BMI	PO Box 630893			Cincinnati	OH	45263-0893	Regular Mail
4	Broadcase Music, Inc.	7 World Trade Center	250 Greenwich St		New York	NY	10007	NOA ECF
5	Bryn Mawr Equipment Finance Inc.	801 Lancaster Avenue			Bryn Mawr	PA	19010-3305	Regular Mail
6	Channel Partners Capital LLC	Attn: Legal Department	1111 E. College Drive	Suite 200	Marshall	MN	56258-1968	Regular Mail
7	City of Altus	509 S Main St			Altus	OK	73521-3335	Regular Mail
8	City of Friona	623 Main St			Friona	TX	79035	Regular Mail
9	City of Hereford	PO Box 2277			Hereford	TX	79045-2277	Regular Mail
10	City of Plainview	502 W 5th			Plainview	TX	79072-8232	Regular Mail
11	City of Vernon	1725 Willbarger St			Vernon	TX	76384-4741	Regular Mail
12	Crest Capital	PO Box 88233			Atlanta	GA	30356-8233	Regular Mail
13	CT Corp. Sys.	Attn: SPMS	330 N Brand Blvd		Glendale	CA	91203-2308	Regular Mail
14	D&D Telecommunications	PO Box 6988			Ablene	TX	79608	Regular Mail
15	Eastland County Appraisal District	c/o Julie Parsons	McCreary, Veselka, Bragg & Allen, P.C.	P.O. Box 1269	Round Rock	TX	78680-1269	NOA ECF
16	Eastland County Appraisal District	c/o Julie Anne Parsons	McCreary, Veselka, Bragg & Allen, P.C.	PO Box 1269	Round Rock	TX	78680-1269	NOA ECF
17	Entergy Utility	PO Box 8105			Baton Rouge	LA	70891-8105	Regular Mail
18	Federal Communications Com.	45 L Street NE			Washington	DC	20554-0001	Regular Mail
19	Financial Agent Services	PO Box 2576			Springfield	IL	62708-2576	Regular Mail
20	Hunt State Bank Athens	PO Box 471			Athens	TX	75751-0471	Regular Mail
21	Global Music Rights	1801 W Olympic Blvd			Pasadena	CA	91199-2180	Regular Mail
22	Hannet Bank	5403 Olympic Dr. #200			Gig Harbor	WA	98335-1853	NOA ECF
23	Hannet Bank	1107 E Pioneer Parkway			Arlington	TX	76010-5866	NOA ECF
24	Hannet Bank	Attn: Paul Cross Esq.	11300 N. Central Expressway Ste. 604		Dallas	TX	75243	phdass@msn.com
25	Hannet Bank	11300 North Central Expressway	Suite 604		Dallas	TX	75243	phdass@msn.com
26	Hannet Bank	14201 Memorial Dr			Houston	TX	77079-6731	Regular Mail
27	High Plains Radio Network, LLC	PO Box 3419			Vernon	TX	76385-3419	Regular Mail
28	Hitchhiker Capital America Corp.	7808 Creekside Circle	Suite 200		Edina	MN	55439-2647	Regular Mail
29	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7317		Philadelphia	PA	19101-7317	Regular Mail
30	Jeffery D. Carruth	Weycer Kaplan Pulaski & Zuber, P.C.	2608 Hibernia	Suite 105	Dallas	TX	75204-2514	jcarruth@kpsaz.com
31	Liberty Mutual Insurance	175 Berkeley Street			Boston	MA	02116-3350	Regular Mail
32	LIH Systems	PO Box 7233			Ablene	TX	79608	Regular Mail
33	McFund Solutions	89 Wall St #2613			New York	NY	10005-4301	Regular Mail
34	M Properties	2627 West Road			Mtn Home	AR	72653	Regular Mail
35	Malakoff ISD	Linebarger Goggin Blair & Sampson, LLP	2777 N. Stemmons Freeway, Suite 1000		Dallas	TX	75207	dallas.bankofcoul@tbs.com
36	Malakoff ISD	Linebarger Goggin Blair & Sampson, LLP	c/o Sherrel K Knighton	2777 N Stemmons Frey, Ste. 1000	Dallas	TX	75207-2328	Sherrel.Knighton@tbs.com
37	Marlin Lease Corp	300 Fellowship Rd			Mount Laurel	NJ	08054	Regular Mail
38	Marlin Leasing Corp	300 Fellowship Rd			Mount Laurel	NJ	08054-1727	Regular Mail
39	Media Facilities	1730 Dell Range Blvd. #418			Cheney	WY	82009-4961	Regular Mail
40	Meridian	367 Eagleview Blvd.			Exton	PA	19341-1156	Regular Mail
41	Meridian Equipment Finance LLC	9 Old Lincoln Highway			Malvern	PA	19355-2551	Regular Mail
42	Meridian Equipment Finance, LLC	c/o Salidutti Law Group	1040 King Highway N, Ste. 100		Cherry Hill	NJ	08034	msalidutti@salidutti.com
43	Midland States Bank	1801 Park 270 Drive	Suite 200		St. Louis	MO	63146-4022	Regular Mail
44	Mitsubishi HC	7201 Metro Blvd. Ste 800			Edina	MN	55439-1333	Regular Mail
45	Mitsubishi HC Capital America, Inc.	c/o Jason Sellers	825 Nicollet Mall, Suite 1608		Minneapolis	MN	55402	jsellers@grandcentral.com
46	Monte Spearman	5837 Silverwood Dr.			Johnstown	CO	80534	direct email
47	Monte Spearman	PO Box 3649			Palestine	TX	75802	Regular Mail
48	New Lane Fin. B-M	801 Lancaster Ave			Bryn Mawr	PA	19010-3305	Regular Mail
49	North Arkansas Electric	PO Box 1000			Salem	AR	72576-1000	Regular Mail
50	Optimum Telephone	1111 Stewart Ave.			Rethpage	NY	11714-3541	Regular Mail
51	Panner	1801 Automation Way #207			Fort Collins	CO	80523-5735	Regular Mail
52	SBA Covid-19 Disaster Loan	PO Box 3918			Portland	OR	97208-3918	NOA ECF
53	Scott M. Seidel - SBRA V	Seidel Law Firm	6505 West Park Blvd	Suite 306	Plano	TX	75093-6212	soott@seidellaw.com
54	SecureNet	101 N Federal HWY Ste 601			Boca Raton	FL	33432-3969	Regular Mail
55	SE SAC	PO Box 5246			New York	NY	10008-5246	Regular Mail
56	South Plains Communications	5811 34th St			Lubbock	TX	79409	Regular Mail
57	Summit	4680 Parkway Dr #300			Mason	OH	45040-7979	Regular Mail
58	Summit Natural Gas	PO Box 676358			Dallas	TX	75267-6358	Regular Mail
59	Texas Comptroller	Rev Acct Div - Bankruptcy Section	PO Box 13528		Austin	TX	78711-3528	Regular Mail
60	The County of Henderson, Texas	c/o Julie Anne Parsons	McCreary Veselka Bragg & Allen, P.C.	P.O. Box 1269	Round Rock	TX	78680-1269	NOA ECF
61	The County of Henderson, Texas	c/o Julie Anne Parsons	McCreary, Veselka, Bragg & Allen, P.C.	PO Box 1269	Round Rock	TX	78680-1269	NOA ECF
62	The County of Stephens, Texas	c/o Julie Anne Parsons	McCreary Veselka Bragg & Allen, P.C.	P.O. Box 1269	Round Rock	TX	78680-1269	NOA ECF

	A	B	C	D	E	F	G	H	I
1	SERVICE LIST	Case No. 22-51323	In re: Kuberlaxmi, LLC				UPDATED:	4/30/2024	
2	C:\Users\jcorruth\ND Office Echo\VAULT-C95LZ1Y\service list (hprn) 001 4878-4499-4995 v.8.xlsx	Sheet1							
3	Name	Address1	Address2	Address3	City	State	Zip	Email	Method of Service / Comment
64	The County of Stephens, Texas	c/o Julie Anne Parsons McCreary, Veselka, Bragg & Allen, P.C.	PO Box 1269		Round Rock	TX	78680-1269	julie.parsons@mbalaw.com	NOA-ECF
65	The Fundworks	299 S. Main St. #1300			Salt Lake City	UT	84111-2241		Regular Mail
66	The Fundworks LLC	c/o Dedicated Financial GBC	4000 Lexington Ave N, Suite 125		Shoreview	MN	55126	bankruptcy@dedicatedfb.com	NOA-ECF
67	Titan Tower	PO Box 6972			Abilene	TX	79608		Regular Mail
68	Turbo Capital	2308 N Market St			Wilmington	DE	19802-4230		Regular Mail
69	TXU Utility	PO Box 60638			Dallas	TX	75265-0638		Regular Mail
70	U.S. Bank Equipment Finance	1310 Madrid Street			Marshall	MN	56258-4099		Regular Mail
71	U.S. Small Business Admin	150 Westpark Way	Suite 130		Eufless	TX	76040	rebekah.osullivan@sba.gov	NOA-ECF
72	U.S. Small Business Administration	1545 Hawkins Blvd Ste 202			El Paso	TX	79925-2654		NOA-ECF
73	U.S. Small Business Administration	c/o Dawn Whalen Theiss	1100 Commerce St Ste 300		Dallas	TX	75242	dawn.theiss@usdof.gov	NOA-ECF
74	United First LLC	2999 NE 191st St			Miami	FL	33180-3123		Regular Mail
75	United Funding	1835 E. Hollandale Beach BLVD			Hollandale Beach	FL	33009-4619		NOA-ECF
76	United Funding	Shanna M. Kaminski	Kaminski Law, PLLC	P.O. Box 247	Grass Lake	MI	49240	skaminski@kaminskilawpllc.com	NOA-ECF
77	United States Trustee	1100 Commerce Street	Room 976		Dallas	TX	75242-0996	erin.schmidt2@usdof.gov	NOA-ECF
78	Verizon Cell Phone	PO Box 660108			Dallas	TX	75266-0108		Regular Mail
79	Vertical Bridge REIT LLC	750 Park of Commerce Dr #200			Boca Raton	FL	33487-3650		NOA-ECF
80	Vertical Bridge REIT LLC	Brandy A. Sargent	K&L Gates	One SW Columbia St., Ste 1900	Portland	OR	97204	brandy.sargent@klgates.com	NOA-ECF
81	Vertical Bridge REIT LLC	David Weitman	K&L Gates	1717 Main Street Suite 2800	Dallas	TX	75201	david.weitman@klgates.com	NOA-ECF
82	Xcel Energy	Attn Bankruptcy Department	Po Box 9477		Minneapolis	MN	55484-0001		Regular Mail
83	Zula Com	PO Box 3649			Palestine	TX	75802-3649		direct email

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	
	§	
HIGH PLAINS RADIO NETWORK, LLC,	§	CASE NO. 24-70089-swe
	§	(Chapter 11, SubV)
DEBTOR.	§	
	§	

**ORDER GRANTING MOTION OF DEBTOR TO REJECT ALL LEASES
WITH VERTICAL BRIDGE REIT LLC (RE: DOCKET NO. 67)**

On this day came on for consideration the *Motion to Reject All Leases with Vertical Bridge REIT LLC* (Docket No. 67) (the “Motion to Reject”) filed herein on April 30, 2024 by High Plains Radio Network, LLC. The Court finds and concludes that the Motion contained the appropriate notices under the Bankruptcy Local Rules; according to the certificate of service attached to the Motion, the Motion was served upon the parties entitled to receive notice under the Bankruptcy Local Rules; no party in interest filed a response or objection to the Motion or

any such response or objection is overruled by this Order; and that upon review of the record of this case and with respect to the Motion that cause exists to grant the relief requested therein.

IT IS THEREFORE ORDERED THAT:

1. The Motion is granted as set forth herein.
2. All capitalized terms shall have the same meaning as ascribed to such terms in the Motion, unless otherwise defined herein.
3. All of the leases and/or executory contracts between the Debtor and Vertical Bridge REIT LLC are rejected effective as of the Petition Date.
4. Vertical Bridge REIT LLC is not entitled to any administrative expense or rent claim.

###END OF ORDER###

Submitted by:

Jeff Carruth (TX SBN: 24001846)
WEYCER, KAPLAN, PULASKI & ZUBER, P.C.
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Dallas, Texas 75204-2514
Telephone: (713) 341-1158
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PROPOSED ATTORNEYS FOR
DEBTORS AND DEBTORS IN POSSESSION

	A	B	C	D	E	F	G	H
1	Exhibit H013 -- Station VB lease status 20240430							
2	Lease	Site	Site	Station	Site	Station Info	ACTIVE /	Note
3	Numb.	Numb.	Location	Calls	Status	Statement with Details	INACTIVE	
4	1807	US-TX-5036	Lubbock	KDAV AM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
5	3348	US-TX-5049	Plainview	KKYN FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
6	3349	US-TX-5049	Plainview	KRIA FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
7	3351	US-TX-5050	Plainview	KREW AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
8	3352	US-TX-5051	Plainview A	KVOP AM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
9	3353	US-TX-5052	Plainview B	KVOP AM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
10	3354	US-TX-5053	Plainview C	KVOP AM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
11	3355	US-TX-5054	Plainview D	KVOP AM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
12	5396	US-AR-5023	Calico Rock	KJMT FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
13	5397	US-AR-5024	Viola	KCMC FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
14	5398	US-AR-5025	Emback	KRZP FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
15	5527	US-TX-5163	Levelland	KLVT AM	On-Air	Station Sold - Owner will move if needed - Can Sell to Owner with New Lease	VB Inactive	Note 1
16	5528	US-TX-5164	Littlefield	KZZN AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
17	5897	US-OK-5007	Altus	KEYB FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
18	5898	US-OK-5016	Hollis	KJOK FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
19	5899	US-OK-5016	Hollis	KKRE FM	Off-Air	Lic. Returned to FCC	VB Inactive	
20	5996	US-OK-5017	Frederick	KYBE FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
21	5997	US-OK-5019	Frederick	KTAT AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
22	6612	US-MS-5036	Greenville	WDMS FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
23	6613	US-MS-5036	Greenville	WGVM AM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
24	6624	US-AR-5034	Helena	KFFA FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
25	6625	US-AR-5035	Helena	KFFA AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
26	7800	US-TX-5363	Malakoff	KCKL FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
27	7801	US-TX-5364	Athens	KLVQ AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
28	7803	US-TX-5364	Athens	KLVQ AM	Off-Air XX	FCC STA - Can Return FCC Lic. - Offer to Trade Tower for OKLA Two Sites	VB Inactive	
29	7821	US-CO-5066	Buena Vista	KSKE AM	Off-Air	Lic. Returned to FCC	VB Inactive	
30	7995	US-AR-5039	Gurdon	KYXK FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
31	7996	US-AR-5040	Caddo Valley	KWPS FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
32	8338	US-AR-5036	Benton	KAFN AM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
33	8339	US-AR-5037	Malvern	KZYP AM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
34	8340	US-AR-5038	Arkadelphia	KDEL FM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
35	8341	US-AR-5038	Arkadelphia	KVRC AM	On-Air XX	Can be Turned off with FCC STA Filing - Can Sell With New Lease to Buyer	VB ACTIVE	
36	8682	US-TX-5493	Graham	KWKQ FM	On-Air	Station Sold - Owner will move if needed - Can Sell to Owner with New Lease	VB Inactive	Note 1
37	8683	US-TX-5494	Graham	KSWA AM	Off-Air	Lic. Returned to FCC	VB Inactive	
38	8684	US-TX-5495	Breckenridge	KLXK FM	On-Air	Station Sold - Owner will move if needed - Can Sell to Owner with New Lease	VB Inactive	Note 1
39	8685	US-TX-5495	Breckenridge	KROO AM	Off-Air	Lic. Returned to FCC	VB Inactive	
40	9867	US-TX-5577	Vernon	KVWC AM	Off-Air	Lic. Returned to FCC	VB Inactive	
41	9868	US-TX-5577	Vernon	KVWC FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
42	10006	US-TX-5578	Lariat	KICA AM	Off-Air	Lic. Returned to FCC	VB Inactive	
43	10007	US-TX-5578	Lariat	KICA FM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
44	10008	US-TX-5578	Lariat	KKYC FM	Off-Air	Lic. Returned to FCC	VB Inactive	
45	10009	US-TX-5579	Friona	KGRW FM	On-Air	New Site Lease - VB Not Needed - FCC STA File to Change Site & Power	VB Inactive	
46	10010	US-TX-5579	Friona	KKNM FM	Off-Air	FCC STA - Can Sell With New Lease to Buyer	VB Inactive	
47	Note 1	Debtor sold these stations approximately three years ago with the consent of VB. The parties have sine disputed the sale and/or effects of the sale. VB possibly still carries these lease in the name of the Debtor. Debtor reserves all facts, claims, issues, rights, remedies, and/or defenses regarding these stations, the leases, and the sale.						